



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

PSS:DMP  
F.#2011R02392

*271 Cadman Plaza East  
Brooklyn, New York 11201*

April 13, 2012

**By FedEx and ECF**

Arnold P. Keith, Jr.  
Hornstein, Palumbo & Keith  
350 Broadway, Suite 1201  
New York, NY 10013

Scott L. Fenstermaker, Esq.  
100 Park Avenue, 16th Floor  
New York, New York 10017

Re: U.S. v. Kwan Miller and Sherieka Smalling  
Criminal Docket No. 12-61 (JBW)

Dear Mssrs. Keith and Fenstermaker:

Enclosed please find supplemental discovery pursuant to Rule 16 of the Federal Rules of Criminal Procedure. This letter supplements the government's prior discovery letters and productions of February 15, 2012; March 1, 2012; April 2, 2012; and April 11, 2012. The government also reiterates its request for reciprocal discovery from the defendants.

Enclosed please find the following:

- A DVD (Bates numbered KM 23) containing email from the account [reeka1029@hotmail.com](mailto:reeka1029@hotmail.com) through December 2011;
- CD-ROMs (Bates numbered KM 24 and KM 25) containing email, calendar, address book, and registration information from the account [joelchaudry@yahoo.com](mailto:joelchaudry@yahoo.com);
- A CD-ROM (Bates numbered KM 26) containing photographs taken of 300 Prospect Avenue, Apartment 11E, Hackensack, New Jersey, on December 20, 2011, prior to, during and after the execution of a search warrant;
- A CD-ROM (Bates numbered KM 27) containing photographs taken of 525 East 26th Street, Apartment 2F, Brooklyn, New York, on December 20, 2011, prior to, during and after the execution of a search warrant;

- A CD-ROM (Bates numbered KM 28) containing images of the hard drives of computers seized in the searches of 300 Prospect Avenue, Apartment 11E, Hackensack, New Jersey, and 525 East 26th Street, Apartment 2F, Brooklyn, New York, on December 20, 2011;
- A CD-ROM (Bates numbered KM 29) containing the contents (except for video) of an Apple iPhone with serial number 880495 seized from 300 Prospect Avenue, Apartment 11E, Hackensack, New Jersey, on December 20, 2011;
- A DVD (Bates numbered KM 30) containing the video contents of an Apple iPhone with serial number 880495 seized from 300 Prospect Avenue, Apartment 11E, Hackensack, New Jersey, on December 20, 2011;
- A CD-ROM (Bates numbered KM 31) containing the contents of an HTC 18585 Touch HD2 mobile phone with IMEI number 357779030624884 seized from 300 Prospect Avenue, Apartment 11E, Hackensack, New Jersey, on December 20, 2011;
- A CD-ROM (Bates numbered KM 32) containing the contents of a Sanyo SCP-3100 CDMA mobile phone with Digital Equipment Corporation serial number 00514127900 seized from 300 Prospect Avenue, Apartment 11E, Hackensack, New Jersey, on December 20, 2011;
- A CD-ROM (Bates numbered KM 33) containing the contents of a Motorola i9 mobile phone with serial number 364VKG2BQK and SIM card 00831472464300 seized from 300 Prospect Avenue, Apartment 11E, Hackensack, New Jersey, on December 20, 2011;
- A DVD (Bates numbered KM 34) containing the contents of a SanDisk micro SD card contained in a Blackberry 8530 mobile phone with Mobile Equipment Identifier number 268435459711887917 seized from 300 Prospect Avenue, Apartment 11E, Hackensack, New Jersey, on December 20, 2011;
- A CD-ROM (Bates numbered KM 35) containing the contents of a SIM card contained in a Motorola i9 mobile phone with IMEI number 001700151225830 seized from 300 Prospect Avenue, Apartment 11E, Hackensack, New Jersey, on December 20, 2011;

3

- A DVD (Bates numbered KM 36) containing the contents of a SanDisk micro SD card contained in an HTC mobile phone with IMEI number 357779030624884 seized from 300 Prospect Avenue, Apartment 11E, Hackensack, New Jersey, on December 20, 2011;
- A CD-ROM (Bates numbered KM 37) containing the contents of an HTC myTouch Glacier mobile phone with IMEI number 359637039796442 seized from 300 Prospect Avenue, Apartment 11E, Hackensack, New Jersey, on December 20, 2011;
- A CD-ROM (Bates numbered KM 38) containing a YouTube video from defendant Kwan Miller's Facebook page;

If you have any questions or further requests, please do not hesitate to contact me.

Very truly yours,

LORETTA E. LYNCH  
United States Attorney

By: /s/ Douglas M. Pravda  
Douglas M. Pravda  
Assistant United States Attorney  
(718) 254-6268

Enclosures

cc: Clerk of Court (JBW) (w/o enclosures)